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International Brotherhood of Electrical Workers Local Union 1245

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:)	CASE NO.: 19-30088
)	CASE NO.: 19-30089
PG&E CORPORATION and PACIFIC GAS &)	
ELECTRIC COMPANY)	Chapter 11
)	
Debtors)	(JOINT ADMINISTRATION
)	PENDING)
)	
)	INTERNATIONAL
)	BROTHERHOOD OF
)	ELECTRICAL WORKERS, LOCAL
)	UNION NO. 1245'S RESERVATION
)	OF RIGHTS REGARDING
)	MOTION OF DEBTORS
)	PURSUANT TO 11 U.S.C. §§ 105(a),
)	363(b), AND 507 AND FED. R.
)	BANKR. P. 6003 AND 6004 FOR
)	INTERIM AND FINAL
)	AUTHORITY TO (I) PAY

) PREPETITION WAGES,
) SALARIES, WITHHOLDING
) OBLIGATIONS , AND OTHER
) COMPENSATION AND BENEFITS;
) (II) MAINTAIN EMPLOYEE
) BENEFITS PROGRAMS; AND (III)
) PAY RELATED
) ADMINISTRATIVE
) OBLIGATIONS
)
)
) Date: January 31, 2019
) Time: 10:00 AM
) Place: Courtroom 17, U.S. Bankruptcy
) Court, 16th Floor, 450 Golden Gate
) Avenue, San Francisco, California

The International Brotherhood of Electrical Workers Local Union 1245 (“IBEW”), files this Reservation of Rights in response to the *Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a), 363(b), and 507 and Fed. R. Bankr. P. 6003 and 6004 for Interim and Final Authority to (I) Pay Prepetition Wages, Salaries, Withholding Obligations, and Other Compensation and Benefits; (II) Maintain Employee Benefits Programs; and (III) Pay Related Administrative Obligations* (Doc. No. 8) (the “Employee Wages and Benefits Motion”)¹ and states as follows:

I. Introduction

The IBEW is a labor organization affiliated with the American Federal of Labor – Congress of Industrial Organizations (“AFL-CIO”). The IBEW represents approximately 20,000 private and public sector employees working in the electric and gas utilities industry and related fields, including approximately 12,000 electrical, gas, and clerical employees of Pacific Gas & Electric Company (“PG&E”), and nearly 6,000 employees of contractors providing service to PG&E, that work throughout California. IBEW members are responsible for building, maintaining and repairing PG&E’s electric and gas distribution and transmission systems, as well as providing over-the-phone and in-person customer service to PG&E’s customers, and they are therefore critical to PG&E’s ability to supply electricity and gas to approximately 16 million California residents. The IBEW will

¹ The Employee Wages and Benefits Motion was also filed at Doc. No. 8 in Case No. 18-30089. While Debtors’ Motion for Joint Administration remains pending, the IBEW will file this reservation solely in Case No. 18-30088 for purposes of judicial economy.

1 support PG&E's reorganization efforts in these proceedings to the furthest extent practicable, and it
2 looks forward to working with PG&E toward an exit from bankruptcy that leaves PG&E better
3 positioned to continue providing service and employing IBEW members for years to come.

4 **II. Reservation**

5 The IBEW has reviewed the Employee Wages and Benefits Motion and supports entry of the
6 proposed interim order granting the Employee Wages and Benefits Motion. Entry of the interim
7 order is vital to the IBEW's members and will allow PG&E's employees to avoid disruption of
8 wages, benefits, including retirement benefits and pensions. The IBEW has certain questions related
9 to the Employee Wages and Benefits Motion that the IBEW plans to address with PG&E before
10 entry of a final order. Therefore, the IBEW reserves all rights with respect to entry of a final order.

11
12 Dated: January 30, 2019

Respectfully submitted,

13 LOCKE LORD LLP

14
15 By: /s/ Meagan S. Tom

16 Bradley C. Knapp

17 W. Steven Bryant

Meagan S. Tom

Attorneys for Creditor

International Brotherhood of Electrical Workers Local Union 1245